

1 **SAO**
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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF, NEVADA**

8 HILLCREST INVESTMENTS, LTD., a
9 Canadian Corporation; AMERGOSA
10 ENTERPRISE, LLC.,
11 Plaintiffs,

12 vs.

13 AMERICAN BORATE COMPANY a foreign
14 corporation; AMERICAN BORATE COMPANY
15 OF TEXAS a foreign corporation, STATE
16 ENGINEER, STATE OF NEVADA,
17 DEPARTMENT OF CONSERVATION AND
18 NATURAL RESOURCES, DIVISION OF
19 WATER RESOURCES, A Nevada Political
20 Subdivision; RAMM Corporation, a Nevada
21 Corporation; UNITED STATES FISH AND
22 WILD SERVICE a division of the UNITED
23 STATES; NATIONAL PARK SERVICE, a
24 division of the UNITED STATES; and DOES I-
25 V, ROES VI-X,

26 Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE
TO FILE RESPONSE DEFENDANTS
AMERICAN BORATE COMPANY AND
AMERICAN BORATE COMPANY OF
TEXAS' MOTION TO DISMISS
(FIRST REQUEST)**

22 **COMES NOW**, Plaintiffs and Defendants, **AMERICAN BORATE COMPANY AND**
23 **AMERICAN BORATE COMPANY OF TEXAS'** (hereafter "American Borate") by and
24 through their respective attorneys of record hereby stipulate and agree as follows:

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1 On June 4, 2021, the Nevada State Engineer filed a Motion to Dismiss (“Motion”). *See*
2 (ECF No. 7). Plaintiff’s response to the Motion was originally due on June 18, 2021. The parties
3 agreed to extend the response deadline to June 24, 2021, to accommodate workload and
4 scheduling conflicts for Plaintiff’s counsel. This is the parties’ first request..
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6 **LEONARD LAW PC**

7
8 /s/ Debbie Leonard

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13 220 Reno, Nevada 89502 (775)
14 964-4656
15 Attorneys for American Borate
16 Company and American Borate
17 Company of Texas


**LAW OFFICES OF BYRON
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/s/ Byron E. Thomas

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Attorney for Plaintiffs

16 **IT IS SO ORDERED.**

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RICHARD E. BOULWARE, II
20 **United States District Court**

21 DATED this 22nd day of June, 2021.
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